UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

PNC BANK, N.A. COLUMBIA	§	
HOUSING SLP CORPORATION, and	§	
2013 TRAVIS OAK CREEK, LP	§	
	§	
Plaintiffs,	§	Case No. 1:17-cv-584-RP-ML
	§	
v.	§	
	§	consolidated with
	§	Case No. 1:17-cv-560-RP
2013 TRAVIS OAK CREEK GP, LLC,	§	
2013 TRAVIS OAK CREEK	§	
DEVELOPER, INC.,	§	
CHULA INVESTMENTS, LTD.,	§	
and RENE O. CAMPOS	§	
	§	
Defendants.	§	

UNOPPOSED MOTION TO INCREASE PAGE LIMIT FOR PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION TO CLARIFY OR MODIFY PRELIMINARY INJUNCTION

Plaintiffs PNC Bank, N.A., Columbia Housing SLP Corporation, and 2013 Travis Oak Creek LP (together, "Plaintiffs") respectfully move for an increase in the page limit for their Response to the Motion to Clarify or Modify Preliminary Injunction [ECF Doc. No. 103] (the "Motion") to 13 pages.

I. RELIEF REQUESTED

Plaintiffs request that the Court increase the page limit for their Response to the Motion from 10 to 13 pages.

Plaintiffs seek this relief so that they may adequately respond to the Motion. The Motion seeks to modify the Preliminary Injunction in place in this case and effectively requests a mandatory injunction from the Court ordering Plaintiffs to expend millions of dollars. Given the nature of the relief requested in the Motion and the importance of maintaining the existing

Preliminary Injunction in this case, Plaintiffs request additional briefing space to present their responsive arguments to the Court.

Counsel for Plaintiffs has conferred with Kenneth Chaiken, counsel for Defendants, and he is not opposed to the relief requested in this Motion.

II. CONCLUSION

For these reasons, Plaintiffs request that the Court grant them leave to file a Response to the Motion not to exceed 13 pages.

Dated: November 30, 2017.

By: /s/ Robert M. Hoffman

Robert M. Hoffman Texas Bar No. 09788200

robhoffman@andrewskurth.com

James C. Bookhout Texas Bar No. 24087187

jamesbookhout@andrewskurth.com

ANDREWS KURTH KENYON LLP

1717 Main Street, Suite 3700

Dallas, Texas 75201

Telephone: (214) 659-4400 Facsimile: (214) 659-4401

David P. Whittlesey Texas Bar No. 00791920

dwhittlesey@andrewskurth.com

ANDREWS KURTH KENYON LLP

111 Congress Avenue, Suite 1700

Austin, Texas 78701

Telephone: (512) 320-9200 Facsimile: (512) 320-9292

ATTORNEYS FOR PLAINTIFFS PNC BANK, N.A., COLUMBIA HOUSING SLP CORPORATION, AND 2013 TRAVIS OAK CREEK, LP

CERTIFICATE OF CONFERENCE

	I certify	that or	n Novemb	er 30	, 2017	, I	conferr	ed	with	Kenneth	Chaiken,	counsel	for
Defenda	ants, via	email,	and he indi	cated	that D	efe	ndants a	are i	not o	pposed to	the relief	requeste	ed in
this Mo	otion.												

/s/ Robert M. Hoffman
Robert M. Hoffman

CERTIFICATE OF SERVICE

I certify that on November 30, 2017, a copy of the foregoing document was served on all counsel of record in this case through the Court's CM/ECF facilities.

/s/ Robert M. Hoffman
Robert M. Hoffman